

AO 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.
Andre Deshawn Williams

Case: 2:20-mj-30447
Assigned To : Unassigned
Assign. Date : 10/23/2020
In Re: SEALED MATTER (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 2020 through Septmeber 2020, in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC § 2252A(a)(2)(A)	Receipt and distribution of child pornography
18 USC § 2252A(a)(5)(A)	Possession of child pornography

This criminal complaint is based on these facts:
see attached affidavit.

☒ Continued on the attached sheet.

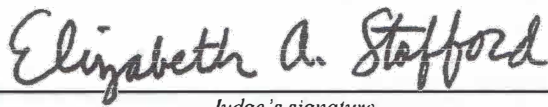
Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: October 23, 2020

City and state: Detroit, Michigan


Complainant's signature

Adam Christensen, Special Agent (FBI)
Printed name and title


Judge's signature

Hon. Elizabeth A. Stafford, United States Magistrate Judge
Printed name and title

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR
COMPLAINT AND ARREST WARRANT**

I, Adam Christensen, having been first duly sworn, do hereby depose and state as follows:

I. INTRODUCTION

1. I have been employed as a Special Agent of the FBI since 2010, and am currently assigned to the Detroit Division. While employed by the FBI, I have investigated federal criminal violations related to child exploitation, and child pornography. I have gained experience through training and everyday work relating to conducting these types of investigations. I have received training in the area of child pornography and child exploitation, and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. §§ 2251, 2252A, and 2422, and I am authorized by the Attorney General to request an arrest warrant.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for **Andre Deshawn Williams** (date of birth 11/XX/1972) for violations of 18 U.S.C. §§ 2252A(a)(2)(A) (receipt and distribution of child pornography) and 2252A(a)(5)(A) (possession of child pornography).

3. The statements contained in this affidavit are based in part on: written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents; independent investigation and analysis by law enforcement officers/analysts and computer forensic professionals; and my experience, training and background as a Special Agent (SA) with the FBI. Because this affidavit is being submitted for the limited purpose of securing authorization for the requested arrest warrant, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause that **Williams** has violated Title 18 U.S.C. §§ 2252A(a)(2)(A) and 2252A(a)(5)(A).

II. BACKGROUND OF INVESTIGATION

4. On April 16, 2020, an online undercover employee (undercover) of the Federal Bureau of Investigation was added to a specified group¹ on the smartphone application Kik, which is a messaging application. The undercover determined that this group's primary purpose was to facilitate the trading of images and videos that meet the Federal definition of child pornography.

5. One of the users that was a member of this group utilized the Kik username wolf25800. Between the period of on or about April 16, 2020 and April 21,

¹ The name of this group on Kik is known to the FBI, but is not being stated in this affidavit to protect an ongoing investigation into other defendants.

2020, this user distributed 29 images of boys under the age of 13 that were nude and in sexually explicit positions. On April 20, 2020, this user left the group.

6. Your affiant reviewed these images, which appear to be two series of images of the same boys. The first series, which consists of 5 of the 29 images distributed by wolf25800, involves two boys, one of which appears to be approximately 11 years old and the other appears to be 15 years old. In one of the images, entitled IMG_0627.jpg, the older boy is laying on a blue couch with his legs spread and shorts on and the younger boy is laying on top of the older boy with the older boys arm draped across his chest. The younger boy is wearing red underwear and he has them pulled down to expose his penis.

7. The second set of images, which consists of 24 of the 29 images distributed by Kik user wolf25800, primarily involves one boy, although some of them include a girl of approximately the same age. Most of the images show the boy, who appears to be approximately 10 years old, completely nude and spilling what appears to be whip cream onto his body. One such image, entitled IMG_0637.jpg, shows the boy laying on a table completely nude, spilling the whip cream near his penis.

8. On May 21, 2020, Media Labs, the owners of Kik, responded to a subpoena request for subscriber information for the username wolf25800. The subscriber information that the email associated with the account was

awkingwolf258@gmail.com and that a Huawei BG2-W09, which is a tablet computer, was used to access the account. The logon information showed that all of the logins to the account provided, from April 23, 2020 to April 28, 2020, came from IP address 45.23.116.228.

9. Open source information showed that AT&T was the owner of the IP address 45.23.116.228. On May 23, 2020, AT&T responded to a subpoena request for subscriber information for the specified IP address. This response shows that the IP address was assigned from March 18, 2020, to May 16, 2020, to the subscriber **Andre Williams**, at an apartment on Santa Rosa Drive in Detroit, Michigan. The subscriber information also showed that Williams had listed his email address as awkingwolf258@gmail.com, the same email address utilized on the Kik account.

10. A check of criminal history for **Andre Deshawn Williams**, showed that **Williams** has a May 2007 federal conviction for transportation of child pornography, in violation of 18 U.S.C. § 2252A(a)(1). **Williams** received a five-year prison sentence and is now a registered sex offender. A check of Michigan Sex Offender Registry on September 14, 2020, showed that **Andre Deshawn Williams** is currently listed as an absconder with a last verification date of May 9, 2016. This registration showed the same information as the criminal history, that the registration requirement

for **Williams** started on May 21, 2007, and that his violation was for 18 U.S.C. § 2252A(a)(1).

11. Based in part on the information detailed above, a search warrant was authorized in the Eastern District of Michigan on September 17, 2020, for the Santa Rose Drive apartment where **Williams** resided.

12. The search warrant was executed on September 22, 2020. **Williams** was present at the residence and voluntarily agreed to be interviewed. During the interview, **Williams** stated that he had resided at the residence for approximately three years. He acknowledged using the smartphone application Kik and had viewed child pornography images on the Kik application. **Williams** also stated that the email address awkingwolf258@gmail.com was his email address that he utilized for his Xbox.

13. Items that were seized from **Williams**' residence included a Huawei BG2-W09 tablet computer, the same make and model used by Kik user wolf25800. The tablet was found in the kitchen trash can at the top of the trash and was broken in half. Another item seized was a LG model V20 cellular telephone. Analysis of the images and videos found on this smartphone revealed 613 unique images and 75 unique videos that meet the Federal definition of child pornography. Some of these images were of the same series of images that had been distributed by the Kik user

wolf25800 to the FBI undercover officer.

III. CONCLUSION

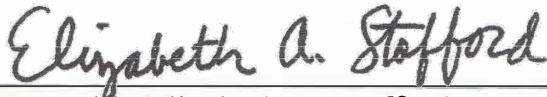
14. Based on the foregoing, there is probable cause to believe **Andre Deshawn Williams** has received and distributed received child pornography, in violation of 18 U.S.C. § 2252A(a)(2)(A), and possessed child pornography, in violation of 18 U.S.C. § 2252A(a)(5)(A).

Respectfully submitted,



Adam Christensen, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my
presence and/or by reliable electronic means.



Honorable Elizabeth A. Stafford
United States Magistrate Judge

Dated: October 23, 2020